

**Rambler, Alexis**

**From:** Hammonds, Lessie  
**Sent:** Thursday, October 14, 2021 10:56 AM  
**To:** Besley, Sharon; josh@stomostorage.com; Grube-Lybarker, Carri; Hall, Roger  
**Cc:** Wessinger-Hill, JoAnne; PSC\_Contact; PSC Clerk'sOffice; McGill, Thomas; Watts, Victoria; Hatem, Kristy; McMullan, Pamela  
**Subject:** RE: [External] Re: Docket No. 2021-233-T, Application of Denton & Company, LLC, DBA MoveMo Moving & Packing, for a Class E Household Goods Certificate of PC&N

Thank you. Will you please confirm that the prehearing conference that was scheduled for Monday, October 18, 2021 is canceled? Thanks, Lessie Hammonds

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**From:** Besley, Sharon <sharon.besley@psc.sc.gov>  
**Sent:** Wednesday, October 13, 2021 4:51 PM  
**To:** josh@stomostorage.com; Grube-Lybarker, Carri <clybarker@scconsumer.gov>; Hall, Roger <RHall@scconsumer.gov>; Hammonds, Lessie <lhammonds@ors.sc.gov>  
**Cc:** Wessinger-Hill, JoAnne <JoAnne.Hill@psc.sc.gov>; PSC\_Contact <Contact@psc.sc.gov>; PSC Clerk'sOffice <clerksoffice@psc.sc.gov>  
**Subject:** FW: [External] Re: Docket No. 2021-233-T, Application of Denton & Company, LLC, DBA MoveMo Moving & Packing, for a Class E Household Goods Certificate of PC&N

To All Parties:

Thank you for your email, Mr. Denton. Your request to hold in abeyance the application of Denton & Company for a Class E certificate will be addressed by the Commission. I also wanted to again mention the issue of legal representation for Denton & Company, LLC.

In reviewing this docket it is our understanding the applicant, Denton & Company, LLC, d/b/a MoveMo Moving & Packing, is a limited liability corporation, but is not represented by an attorney in this docket before the Commission. Please review Regulation 103-805(B) of the South Carolina Code of State Regulations regarding **the requirement a limited liability company must have the appropriate representation** under the law:

- A. Parties and Their Representatives. Parties in a case have the right to participate or to be represented in all hearings or pre-hearing conferences related to their case. Except as otherwise provided herein, a party must be represented by an attorney admitted to practice law in South Carolina, or an attorney possessing a Limited Certificate of Admission pursuant to Rule 405, SCACR. No one shall be permitted to represent a party where such representation would constitute the unauthorized practice of law.
- B. Representation of Entities. Except as otherwise provided in S.C. Code Ann. Regs. 103-805(E), any entity including, but not limited to, a corporation, partnership, limited liability company, or professional association, must be represented by an attorney admitted to practice law in South Carolina, or an attorney possessing a Limited Certificate of Admission pursuant to Rule 405, SCACR.**
- C. Representation of Individuals. An individual person not admitted to practice law in South Carolina may represent himself or herself, but may not represent another person. A party proceeding without legal

representation shall remain fully responsible for compliance with the commission's regulations and the Administrative Procedures Act.

D. Notice of Appearance. An attorney or other person authorized to represent a party before the commission pursuant to this regulation **shall file with the commission a notice of appearance when retained or authorized to represent a party after commencement of a case.**

E. Unopposed Matters in Which an Entity May Proceed without Counsel. Subject to the conditions specified in this regulation, an entity may proceed through an authorized agent in any unopposed case, including but not limited to the following:

- 1) application for approval of a tariff,
- 2) application for approval of a contract,
- 3) application for approval of an interconnection agreement between telephone carriers,
- 4) application for approval of a name change,
- 5) application for a certificate of public convenience and necessity to operate as a Class C motor carrier, including a charter passenger carrier, a charter bus, and a taxi, and
- 6) application of a mover of household goods for a certificate of FWA.

If the entity chooses not to use an attorney, it shall include in its submission a written statement from the entity's president, chairperson, general partner, owner, chief executive officer, or authorized agent which states substantially the following:

"I am owner, officer, director, or other person authorized to act on behalf of [Name of Company], and on behalf of [Name of Company], I have elected to submit [Title of Document] to the Public Service Commission of South Carolina without the benefit of legal counsel admitted to practice in South Carolina. In electing to file [Title of Document] without legal counsel, I acknowledge and agree to assume the risk, if any, of resulting adverse legal consequences."

However, if the case becomes opposed, the unrepresented entity must obtain legal representation by an attorney authorized to practice law in South Carolina in order for the commission to allow the matter to proceed.

Please also note, from the South Carolina Code of Laws, "No person may . . . solicit the legal cause of another person or entity in this State unless he is enrolled as a member of the South Carolina Bar pursuant to applicable court rules, or otherwise authorized to perform prescribed legal activities by action of the Supreme Court of South Carolina." S.C. Code Ann. § 40-5-310 (2015).

Yours sincerely,

Sharon Besley

SHARON PLYLER BESLEY  
COMMISSION ATTORNEY  
PUBLIC SERVICE COMMISSION  
STATE OF SOUTH CAROLINA  
[sharon.besley@psc.sc.gov](mailto:sharon.besley@psc.sc.gov)

**From:** Josh Denton - Stomo Mobile <[josh@stomostorage.com](mailto:josh@stomostorage.com)>

**Sent:** Wednesday, October 13, 2021 2:30 PM

**To:** Besley, Sharon <[sharon.besley@psc.sc.gov](mailto:sharon.besley@psc.sc.gov)>

**Cc:** Grube-Lybarker, Carri <[clybarker@scconsumer.gov](mailto:clybarker@scconsumer.gov)>; Hall, Roger <[RHall@scconsumer.gov](mailto:RHall@scconsumer.gov)>; Hammonds, Lessie <[lhammonds@ors.sc.gov](mailto:lhammonds@ors.sc.gov)>; PSC\_Contact <[Contact@psc.sc.gov](mailto:Contact@psc.sc.gov)>; Ellison, Afton <[afton.ellison@psc.sc.gov](mailto:afton.ellison@psc.sc.gov)>; Erskine,

Randy <[Randy.Erskine@psc.sc.gov](mailto:Randy.Erskine@psc.sc.gov)>

**Subject:** [External] Re: Docket No. 2021-233-T, Application of Denton & Company, LLC, DBA MoveMo Moving & Packing, for a Class E Household Goods Certificate of PC&N

To whom it may concern,

I am writing to ask that my application (Docket #2021-233-T) be held in abeyance due to unexpected circumstances with our current labor arrangement.

I plan to move forward with the process as early as the 1st quarter of next year.

Please contact me with any questions or concerns.

Thank you,

Josh Denton

843-425-9008

Denton & Company, LLC dba MoveMo Moving and Packing

On Wed, Oct 6, 2021 at 10:42 AM Besley, Sharon <[sharon.besley@psc.sc.gov](mailto:sharon.besley@psc.sc.gov)> wrote:

Good morning again, all Parties in the above-referenced docket:

The purpose of this email is to send you a survey link so that we may communicate virtually at the Prehearing Conference scheduled in this docket for Monday, October 18, 2021, at 10:00 a.m., and at the Hearing before the Commission scheduled for Wednesday, October 27, 2021, at 2:00 p.m.

The virtual media plan survey for this docket is available now at <https://www.surveymonkey.com/r/7YLJ26S>.

Please use the link to provide all the necessary information. We appreciate receiving your completed survey via the link no later than Monday, October 11, 2021, at 4:00 p.m.

Yours sincerely,

Sharon Besley

**SHARON PLYLER BESLEY**

**COMMISSION ATTORNEY**

**PUBLIC SERVICE COMMISSION**

**STATE OF SOUTH CAROLINA**

[sharon.besley@psc.sc.gov](mailto:sharon.besley@psc.sc.gov)

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